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July 24, 2020

**Via PACER/ECF**

The Honorable Nelson S. Román  
United States Courthouse  
300 Quarropas Street, Room 218  
White Plains, New York 10601

**Re: Waterkeeper Alliance, Inc. v. Spirit of Utah Wilderness, Inc. et al.  
Civil Action No.: 10-cv-1136**

Dear Judge Román:

This law firm represents the plaintiff, Waterkeeper Alliance, Inc. (“Plaintiff”), in the above-captioned suit. On July 22, 2020, defendant Salt e-filed a letter motion requesting an extension of deadline for him to surrender to the U.S. Marshals Service for his repeated, willful violations of this Court’s Orders from July 31, 2020 to September 29, 2020. (ECF Doc. 190). Plaintiff respectfully submits this letter in opposition to Mr. Salt’s extension request given Mr. Salt’s ongoing violations of Your Honor’s orders.

To briefly summarize the relevant background and procedural history, Salt has violated the Court’s initial order (the “Initial Order”, *see* ECF Doc. 100), enjoining Salt from using the name “Waterkeeper” and other related marks from the time it was entered. On October 2, 2017, the Court entered a Contempt Order (the “First Contempt Order”, *see* ECF Doc. 135), and then a second Contempt Order (the “Second Contempt Order”, *see* ECF Doc. 160), because of these violations.

The Second Contempt Order put Salt on clear notice that if he failed to fully comply with the Court’s prior Orders, **“Waterkeeper is granted leave to move for Salt’s imprisonment and any other appropriate relief. This Court may so order Salt’s arrest and confinement if the Court finds that Salt has continued to violate the Orders.”** *See* Second Contempt Order (emphasis supplied). Based on Plaintiff’s unopposed submission, the Court granted Plaintiff’s subsequent motion for contempt and imprisonment (ECF Doc. 168) and entered the Imprisonment Order (ECF Doc. 171), declaring that Salt has continued to blatantly violate all three of the prior orders of this Court in that he: (a) did not post the Statement; (b) did not pay the fines the Court ordered and did not provide an Affidavit or otherwise allege that he had insufficient funds to pay the fines; (c) did not respond to the interrogatories and document requests which were served upon him; (d) failed to provide Plaintiff with a list of his infringements of Waterkeeper’s registered trademarks as required by the First Contempt Order; (e) has continued to refer to himself as the Great Salt Lakekeeper on his website; (f) continues to identify himself as SUW’s registered agent

and states that SUW is doing business as the “Great Salt Lakekeeper”; and (g) continues to refer to himself as the Great Salt Lakekeeper on his LinkedIn website page. The Imprisonment Order originally required Mr. Salt to surrender to the U.S. Marshals Service on March 23, 2020, but the surrender date has already been extended by this Court several times at defendant Salt’s request due to the COVID-19 pandemic.

The interests of justice demand that the Court deny Mr. Salt’s extension request since he has continued to willfully disobey this Court’s Orders *during* the COVID-19 pandemic. According to a recent search of the Utah Division of Corporations website, defendant Salt recently listed “Great Salt Lake Keeper” as a trade name in renewing the corporate registration of defendant Spirit of Utah Wilderness, Inc. on July 1, 2020. Defendant Salt also continues to violate the Court’s Orders by maintaining the prohibited website domain (<http://greatsaltlakekeeper.org/>) and referring to himself as the “Great Salt Lakekeeper” on his LinkedIn page (<https://www.linkedin.com/in/jeff-salt-28798793/>). Copies of recent screenshots from the Utah Division of Corporations website, the Great Salt Lakekeeper website, and defendant Salt’s LinkedIn page are annexed hereto as **Exhibit A**.

Defendant Salt has not even made a good faith attempt to comply and absent imprisonment he will simply continue to openly flout this Court’s Orders. Whatever risks are posed by the COVID-19 pandemic are of Salt’s own making. Mr. Salt’s frivolous, pending appeal has no merit and should not be a factor in the Court’s consideration of his extension request, which should be denied for the reasons set forth above. The “interests of justice” cited by Salt’s counsel require that there be no further delays in his imprisonment.

Thank you for the Court’s attention to this matter.

Respectfully submitted,

**WACHTEL MISSRY LLP**

*Jason L. Libou*

Jason L. Libou, Esq.

# **Exhibit A**



***Great Salt Lakekeeper's Mission  
 is to protect, preserve and defend the watershed resources  
 of the Great Salt Lake drainage basin.***

WWW.GREATSALTLAKEKEEPER.ORG

Lakekeeper  
 Jeff Salt

#### Contact Info

P.O. Box 522220  
 S.L.C., UT 84142

(801) 485-2550

#### Email Us



### River Cleanups

Every year, Great Salt Lakekeeper plans community based river cleanup projects throughout the watershed. With the help of volunteer groups we remove tons of garbage from the waterways.

Organizations can utilize Great Salt Lakekeeper's services to plan river cleanup projects in their cities and neighborhood communities.

In 2007, Great Salt Lakekeeper received an award from the Utah Pollution Prevention Association for our 2006 Jordan River Cleanup Campaign.



### Watershed Tours

Great Salt Lakekeeper provides a unique opportunity to experience the wonderful waterways of the Great Salt Lake watershed region that combines environmental education and recreation.



We operate a fleet of 10 canoes and provide group tours for up to 30 people to some of the following watershed locations:

- Jordan River
- Utah Lake
- Bear River
- Jordanelle Reservoir
- Little Dell Reservoir
- Smith and Morehouse Reservoir
- And many more locations ...



### Great Salt Lake Mercury Reduction Program

Mercury concentrations in Great Salt Lake are the highest levels ever tested by federal scientists, and may pose significant health risks to humans and wildlife living in the drainage basin region.

Great Salt Lakekeeper is working to help evaluate the extent of mercury in our watershed, identify probable sources, assess human health risks, determine economic impacts, and to provide public education.

The extent of mercury compounds in our watershed may be the result of toxic emissions from coal-fired power plants or gold mines operating nearby in Nevada.



Photos by Jeff Salt, Great Salt Lakekeeper.

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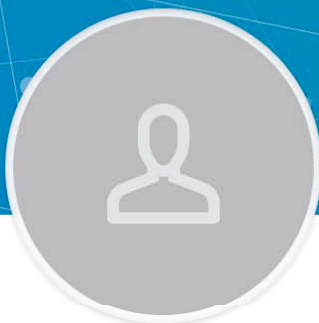
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**Jeff Salt**

Owner, Cosmic Aeroplane, Great Salt Lakekeeper

Salt Lake City, Utah · 21 connections · [Contact info](#)**Cosmic Aeroplane, Great  
Salt Lakekeeper**

## Experience

### Owner

Cosmic Aeroplane, Great Salt Lakekeeper

Apr 2001 – Present · 19 yrs 4 mos

Messaging



DIVISION OF CORPORATIONS AND COMMERCIAL CODE  
BUSINESS SEARCHRELATED  
LINKS & RESOURCES

## SPIRIT OF UTAH WILDERNESS, INC., THE

[Update this Business](#)**Entity Number:** 1130209-0140**Company Type:** Corporation - Domestic - Non-Profit**Address:** 723 E LISONBEE AVE Salt Lake City, UT 84106**State of Origin:** UT**Registered Agent:** [JEFF SALT](#)**Registered Agent Address:**

723 E LISONBEE AVE

Salt Lake City, UT 84106

[View Management Team](#)**Status:** Active[Purchase Certificate of Existence](#)**Status:** Active  as of 09/07/2001**Renew By:** 06/30/2021**Status Description:** Current

The "Current" status represents that a renewal has been filed, within the most recent renewal period, with the Division of Corporations and Commercial Code.

**Employment Verification:** Not Registered with [Verify Utah](#)

## History

[View Filed Documents](#)**Registration Date:** 06/14/1993**Last Renewed:** 07/01/2020

## Additional Information

**NAICS Code:** 9241 **NAICS Title:** 9241-Administration of Environmental Qua

## Doing Business As

LAKE RESTORATION SOLUTIONS, INC.

FRIENDS OF UTAH LAKE, THE

GREAT SALT LAKE WATERSHED COUNCIL

CITIZENS ORGANIZED TO PROTECT PARLEY'S HISTORIC NATURE PARK

FRIENDS OF THE BEAR RIVER, THE

GREAT SALT LAKE **WATER KEEPERS**

FRIENDS OF PARLEY'S HISTORIC NATURE PARK, THE

**GREAT SALT LAKEKEEPER**

JORDAN RIVER RESTORATION NETWORK

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